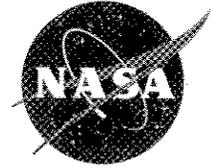


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



May 22, 2008

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at Texas Traditions-A Celebration of the Lone Star State on June 24, 2008

On June 24, 2008, Texas Governor Rick Perry is hosting a kick-off event in conjunction with the 2008 Smithsonian Folklife Festival on the National Mall. This event will be held at the Ronald Reagan Building and International Trade Center. Both Texas and NASA are to be featured during this year's Folklife Festival and the Governor has invited members of the business community, government, media, and tourism officials from Texas and Washington to this event.

Approximately 30 NASA personnel have been invited to attend this event and the event cost is estimated at \$85 per person including food and refreshments. This event will present an opportunity for members of the NASA community to establish an Agency presence at the event and allow NASA personnel to exchange views relating to NASA's mission, including the role of Johnson Space Center located in Houston, with individuals from business, the media and government.

In addition, each attendee may receive an assortment of mementos from various contributing corporations. Attendees are reminded of the \$20 gift exception at 5 C.F.R. §2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion. Accordingly, in addition to accepting free attendance at the event, NASA employees may accept these mementos. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.

I find that the Texas Traditions event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g). Consequently, I conclude that NASA's interest in its employees attending this event outweighs any concern that such free attendance may, or may appear to, improperly influence any NASA personnel in the performance of their official duties.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone